

**Federal Defenders  
OF NEW YORK, INC.**

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April 13, 2022

**By ECF and Email**

Honorable Paul A. Crotty  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*4/13/22*  
*The 60 day adjournment is granted*

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*Paul A. Crotty*  
*GSM*

**Re: United States v. Salazar-Lotero et al.**  
**19 Cr. 661 (PAC)**

Dear Judge Crotty,

I represent Mr. Garcia Sanchez in the above-captioned case. I am writing to respectfully request that the Court adjourn the next status conference in this case, currently scheduled for April 19, 2022, for approximately 60 days. The discovery in this case is voluminous; more than 250 GB of data have been provided to date. Because of the amount of discovery and because of the difficulties in meeting with clients in Westchester County Jail (due to the COVID-19 protocols), we need additional time to review it.

I have spoken with co-counsel Milton Florez, Esq., who represents Mr. Betancourt, and he joins this application. I have also spoken with the government, by Assistant United States Attorney Sheb Swett, and it also consents to this request.

Given the nature of this application, the defense consents to an exclusion of time under the Speedy Trial Act until the newly-selected date.

Thank you for your consideration.

Respectfully submitted,

/s/  
Sylvie Levine  
Assistant Federal Defender